UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

	§.	
	8	
CHARLENE CARTER,	§	
,	§	
PLAINTIFF,	§	
	§	
V.	§	CIVIL CASE NO. 3:17-CV-02278-X
	§	
SOUTHWEST AIRLINES CO., AND	§	
TRANSPORT WORKERS UNION OF	§	
AMERICA, LOCAL 556,	§	
	§	
	§	
DEFENDANTS.	§	
	§	

THE PARTIES' AMENDED TRIAL EXHIBIT LIST

The Parties, having conferred and agreed that there are no objections as to the authenticity of the parties' proposed exhibits, submit this joint trial exhibit list. The Parties reserve the right to make relevance or other evidentiary objections.

EX.	DESCRIPTION	IDENTIFICATION
NO.		
1.	Fourth Amended Complaint	
2.	EEOC Charge re: Southwest	Carter Depo. Exh. 8;
		Carter 1
3.	EEOC Charge re: Local 556	Exh. B to Complaint
4.	Notices of Right to Sue	Exh. C to Fourth
		Amended Complaint
5.	Carter – Response to First Set of Interrogatories	
6.	Southwest Collective Bargaining Agreement	SWA000001-242
7.	Southwest Policy Concerning Harassment, Sexual Harassment,	SWA004125
	Discrimination & Retaliation	
8.	Southwest 3.0.0 Basic Work Rules and Expectations	SWA000500-505

EX.	DESCRIPTION	IDENTIFICATION
NO.		
9.	Southwest Employee Social Media Policy	SWA000508
10.	Southwest Disability Discrimination & Workplace Accommodation	SWA004124
	Policy	
11.	Southwest Mission Statement	SWA000506
12.	Southwest Basic Work Rules and Expectations	SWA000500-505
13.	Southwest Bullying and Hazing Policy	SWA000507
14.	Southwest Disability Discrimination and Workplace Accommodation	SWA004123-4124
	Policy	
15.	Carter history of messaging Local 556 Pres. Stone	SWA000529-550;
		000601-683
16.	Read Before Fly – Jan. 11, 2013	SWA000415
17.	Carter communication re Union activities	Carter Depo. Exh. 12
18.	Read Before Fly – Jan. 14, 2015	SWA005525
19.	Pres. Stone April 20, 2015 social media statement	Carter 109-111
20.	Read Before Fly – May 16, 2015	SWA000416
21.	Southwest August 2015 emails re recall campaign	SWA004483-4484;
21a.	Feb. 24, 2017 Email from Emlet	005680-5681;
21b.	Feb. 24, 2017 Email from Emlet	006322;
21c.	Feb. 24, 2017 Email from Emlet	006351-6354;
21.d	Oct. 20, 2017 Email from Emlet	006522-6555
21.e	Feb. 27, 2017 Email from Emlet	pg. 14-36 unmarked
21.f	April 6, 2017 Email from Burdine	
21.g	April 6, 2017 Email from Sims	
21.h	April 6, 2017 Email from Burdine	
21.i	April 10, 2017 Email from Sims	
21.j	March 14, 2017 Termination Letter from SWA	
21.k	July 28, 2016 Email from Shaffer	
21.1	Aug. 14, 2016 Email from Hudson	
21.m	March 27, 2017 Email from Sims	
21.n	Dec. 19, 2018 Email from Inflight Labor Relations Mailbox	
21.0	Nov. 28, 2017 Email from Chaffin	
21.p	Feb. 23, 2017 Email from Talburt	
21.q	Feb. 23, 2017 Email from Edwards	
21.r	Feb. 26, 2017 Email from Brian	
21.s	FB posts	
21.t	March 1, 2017 Email from Brian	
21.u	May 16, 2017 Email from Sims	
21.v	July 2, 2017 Email from Brian	

EX.	DESCRIPTION	IDENTIFICATION
NO.		
21.w	Aug. 8, 2017 Email from Brian	
21.x	March 26, 2017 Email from Spand	
22.	Pres. Stone August 2015 emails re recall campaign	SWA007358-7367;
		007464-7470
22.a	Diane L. Clark	
22.b	Jeanna Jackson	
22.c	Jeanna Jackson	
22d	Aug. 2 - Jeanna Jackson	
22.e	Pres. Stone August 2017 Email re recall campaign	
22.f	July 31 - Jeanna Jackson	
22.g	July 31 – Allison Carver	
22.h	Aug. 1 – Jeanna Jackson	
22.i	July 31 – Lisa Dedina Contreras	
22.j	July 31 – Jeanna Jackson	
22.k	Aug. 4, 2015 Email from Allen	
22.1	Aug. 4, 2015 Email from Shaffer	
22.m	Aug. 4, 2015 Email from Jordan	
22.n	Aug. 4, 2015 Email from Shaffer	
22.0	Aug. 4, 2015 Email from Shaffer	
23.	President Stone Statement regarding Membership's Vote to Reject	Doc. No. 222-5
	Tentative Collective Bargaining Agreement	
24.	Local 556 Executive Board November 2013 Emails re Carter	Doc. No. 226-7
25.	Local 556 Executive Board February 2014 Emails re Carter	Doc. No. 226-7
26.	Stone Oct 2014 Email with Talburt re Social Media	Doc. No. 226-7
27.	Talburt Oct 2014 Email with Stone re Social Media	Doc. No. 226-7
28.	Talburt Oct 2014 Email with Stone re Social Media	Doc. No. 226-7
29.	Stone Core Team Facebook Group Posts	Doc. No. 226-7
30.	Recall Petition Form	Doc. No. 222-6
31.	Jeanna Jackson Recall Information	Carter 2397-2399
32.	Carter Facebook Posts in Recall Group about Local 556's	Doc. No. 222-14
	Participation in Women's March	
33.	Carter February 2017 Facebook Group Posts about Recall	Doc. No. 222-15
34.	TWU Local 556 Unity Magazine: State of the Union Message	TWU556 9515-9524
35.	Inflight Info on the Go – Feb. 17, 2016	SWA006560
36.	Read Before Fly – Oct. 12, 2016	SWA000417
37.	Inflight Info on the Go – Jan. 20, 2017	SWA401
38.	Read Before Fly – Feb. 22, 2017	SWA000413-414
39.	Pres. Stone Feb. 24, 2017 investigation interview	SWA004633-4638

EX.	DESCRIPTION	IDENTIFICATION
NO.		
40.	Carter Last Chance Agreement	Carter Depo. Exh. 6
41.	Carter Termination Letter	Carter Depo. Exh. 1
42.	Carter 2014-2017 W2	SWA001082-1085
43.	Carter income documents	SWA001086-1168
44.	Carter Work Records	SWA000934-000959
45.	Carter Affidavit	Doc. No. 222-38
46.	Abortion Images	SWA000595-597
47.	Genitalia Depictions	Carter74
48.	Carter Circulated Abortion Video No. 1	SWA000595
49.	Carter Circulated Abortion Video No. 2	SWA000596
50.	Carter Public Facebook Abortion Posts	SWA004645-4646
51.	Set of Messages to Stone	SWA000595-692
52.	Local 556 January 10-12, 2017 Executive Board Meeting Minutes	Doc. No. 222-9
53.	Women's March Planned Parenthood Newsletter	Doc. No. 222-8
54.	Women's March Expenditures	Carter 3268
55.	Local 556 travel forms re Women's March	TWU556-9476-9485
56.	Local 556 Women's March pictures	Carter 867, 1144, 1147, 1148, 1154, 1155, 1158,1159, 1161, 1163, 1167, 1173, 1174, 1176, 1178, 1180, 1182, 1346, 1449
57.	TWU article re Women's March	Parker Depo. Exh. 29
58.	TWU Represented at the Women's March	Doc. No. 222-11
59.	Facebook posts re Local 556 Women's March	Parker Depo. Exh. 30
60.	Local 556 Women's March budget report	TWU556-9488-9492
61.	Oct. 6, 2014 Email – Carter Complaint	Carter2415-2416
62.	Jan. 20, 2017 Email – Statement re: Pink Cabin Lights	SWA006807
63.	Communications re Pink Cabin Lights	SWA006808-6818
64.	Carter's February 2017 Facebook Video Images and Messages	Doc. No. 222-16
	Posted on Her Facebook Page	
65.	Carter's February 2017 Facebook Video Images and Messages sent	Doc. No. 222-17
	to President Stone	
66.	Feb. 22, 2017 Email – Stone Report Facebook Posts / Graphic	SWA004226-4233
	Images	
67.	Feb. 22, 2017 Email – Stone Follow Up Email re: Facebook Posts /	SWA004421-4422
	Graphic Images	

EX.	DESCRIPTION	IDENTIFICATION
NO.		
68.	Feb. 22, 2017 Email – Brian to OGrady et al	SWA004487-4496
69.	Feb. 22, 2017 Email – Brian to OGrady et al	SWA004497-4523
70.	Feb. 22, 2017 Email – Brian to OGrady et al	SWA004524-4545
71.	Feb. 22, 2017 Email – Brian to OGrady et al	SWA004546-4568
72.	Feb. 22, 2017 Email – Brian to OGrady et al	SWA004569-4591
73.	Feb. 23, 2017 Email – Base Manager Follow Up Email re: Facebook	SWA004239-4240
	Posts / Graphic Images	
74.	Feb. 23, 2017 Email – E. Schneider Email re: Stone Report	SWA004450-4455
75.	Feb. 23, 2017 Email – Hudson to Stephenson	SWA004456-4458
76.	Feb. 23, 2017 Email – D. Gutierrez Response to E. Schneider re:	SWA004459-4461
	Stone Report	
77.	Feb. 23, 2017 Email – Kissman to Sims	SWA004465
78.	Feb. 23, 2017 Email – Kissman to Hudson	SWA004468-4470
79.	Feb, 23, 2017 Email – Hudson to Kissman	SWA004471-4473
80.	Feb. 23, 2017 Email – Kissman to Hudson	SWA004474-4476
81.	Feb, 23, 2017 Email – Hudson to Kissman	SWA004477-4479
82.	Feb. 23, 2017 Email – E. Schneider Email re: Stone Meeting	SWA007159-7166
83.	Feb. 23, 2017 Email – M. Emlet Email re: Stone Report Facebook	SWA005682-5687
	Posts / Graphic Images	
84.	Feb. 24, 2017 Email – Emlet to Kissman et al	SWA004483-4484
85.	Feb. 24, 2017 Email – Emlet to Shaffer	SWA005681
86.	Feb. 24, 2017 Email – Emlet to Shaffer	SWA005682-5687
87.	Feb. 24, 2017 Email – Emlet to Stephenson et al	SWA005688-5693
88.	Feb. 24, 2017 Email – Schneider to Emlet et al	SWA005694-5696
89.	Feb. 24, 2017 – A. Stone Fact Finding Meeting Notes	SWA004634-4638
90.	Feb. 24, 2017 Email – M. Emlet Email re: Nexus	SWA006504-6513
91.	Feb. 25, 2017 Email – M. Emlet Email re: Stone Complaint	SWA005682-005687
92.	Feb. 26, 2017 Email – C. Carter Email re: Fact Finding Meeting	SWA004277-4279
93.	Feb. 27, 2017 Email – Barnett to Edwards	SWA004485-4486
94.	Feb. 27, 2017 Email and Attachments – A. Stone Screenshots	SWA004244-4267
95.	Feb. 27, 2017 Email – Gutierrez to Stone	SWA000529-550
96.	Feb. 28, 2017 Email – Schneider to Emlet et al	SWA004633-4638
97.	Feb. 29, 2017 Email and Attachments – A. Stone Facebook Thread	SWA000529-550
98.	C. Carter Fact Finding Meeting Notes	SWA004676-4692
99.	Mar. 7 Email and Attachments – D. Gutierrez to E. Schneider re:	SWA004643-4646
100	Public Posts	CVV 4 00 4 CT 7 4 CO 2
100.	Mar. 7, 2017 Carter investigation notes	SWA004675-4692
101.	Southwest correspondence re Carter investigation	SWA004421,

EX.	DESCRIPTION	IDENTIFICATION
NO.		
		004433, 004436,
		004444, 004450,
		004456, 004459,
		004624, 004630,
		004863, 005697,
		005882, 006819,
		007159
102.	Carter Facebook re purported nexus to Southwest	SWA006504-6512
103.	Mar. 9, 2017 Email and Attachments – Re: Carter Fact Finding Notes	SWA004675-4710
	and Materials	
104.	Mar. 7, 2017 Fact Finding Meeting Notes and Schneider Email to	SWA004675-4692
	Emlet et al	
105.	Mar. 9, 2017 Email and Attachments – Re: Carter Fact Finding	SWA004647-4674
	Meeting Presentation	
106.	Mar. 9, 2017 Email – Emlet to Shaffer	SWA005697-5758
107.	Mar. 10, 2017 Email – E. Schneider Investigation Summary	SWA004711-4712
108.	Mar. 13, 2017 Email – Investigation and Images	SWA004713-4714
109.	Mar. 13, 2017 Email – Emlet to Schneider	SWA005759-5761
110.	Mar. 13, 2017 Email – Correspondence re: Investigation and	SWA005762-5763
	Termination Letter	
111.	Mar. 13, 2015 Email – Schneider to Emlet	SWA005762-5764
112.	Mar. 27, 2017 Email – Sims to Shaffer	SWA005775-5777
113.	Mar. 27, 2017 Email – Sims to Shaffer	SWA005778-5780
114.	Mar. 27, 2017 Email – Sims to Shaffer	SWA005781-5783
115.	Southwest's March 14, 2017 Termination Letter	SWA005796
116.	Mar. 29, 2017 Email – Additional C. Carter Posts	SWA005784-5788
117.	Apr. 3, 2017 Email – Chaffin to Inflight	SWA005789-5813
118.	Apr. 4, 2017 – Carter Step 2 Documents	SWA000785-933
119.	Apr. 6, 2017 Email – Burdine to Sims	SWA005814-5831
120.	Apr. 17, 2017 Email – Carter Correspondence re: Fake Facebook	SWA000523
	Posts	
121.	Apr. 17, 2017 Email – Additional Carter Correspondence re: Fake	SWA000481-483
	Facebook Posts	
122.	Apr. 18, 2017 Email – Carter Correspondence to M. Sims	SWA006911-6913
123.	April 19, 2017 Text Message – Carter Message With Lynn	Carter Depo. Exh. 7
	Montgomery	
124.	Apr. 26, 2018 – Opinion and Award of the Arbitrator	SWA000707-725
125.	Southwest Flight Attendant Social Media Pictures	Carter 4134-4167
		1

EX.	DESCRIPTION	IDENTIFICATION
NO.		
126.	Counselor invoice	Carter 2417
127.	Counselor invoice	Carter Depo. Exh. 10
128.	Counselor expenses	Carter4489
129.	Medical bills	Carter2418
130.	Carter earnings	Carter2419-2424
131.	Carter employment efforts	Carter2213-2222
132.	Southwest April 4, 2017 Email regarding Local 556 President Stone	SWA007471
	and Shop Steward Spand reporting Recall Leader Jeanna Jackson and	
	other Flight Attendants for Discipline	
133.	Feb. 23, 2017 Email – E. Schneider Email re: Stone Meeting	SWA007159-7166
134.	Recall Petition Findings and Process	TWU 7390-7398
135.	TWU Local 556 Bylaws	TWU 7373-7381
136.	Text to Lynn Montgomery	TWU 4176-4391
137.	Emails concerning Carter's Step 2 hearing	TWU 4176-491
138.	Southwest Airlines Co. 2021 Annual Report	Carter 4503-4670
139.	Jan. 24, 2017 Email from Listening Center	
140.	Oct. 13, 2014 Email from Brian	
141.	Oct. 13, 2014 Email from Brian	
142.	Brian Talburt Feb. 16 Post	
143.	Brian Talburt Post	
144.	Oct. 6, 2014 Fact Finding Meeting Notes – Brian Talburt	
145.	April 13, 2015 Email from Brian re Flight Attendant Statement	
146.	Jan. 30, 2014 Email from Lacore	SWA 006567-6572

Dated: July 6, 2022 Respectfully submitted,

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